

BEFORE THE PUBLIC UTILITES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION
OF DAKOTA ACCESS, LLC FOR AN
ENERGY FACILITY PERMIT TO
CONSTRUCT THE DAKOTA ACCESS
PIPELINE

HP14-002

PRE-FILED TESTIMONY OF
STEVE HARPER

STATE OF SOUTH DAKOTA)
 :SS
COUNTY OF BROWN)

1 Steve Harper, being first duly sworn on his oath, deposes and states as follows:

2 **Please state your name and address.**

3 Steve Harper
4 General Manager
5 WEB Water Development Association, Inc. (WEB Water)
6 P.O. Box 51
7 Aberdeen, SD 57402

8 **Who are you testifying on behalf of in this proceeding?**

9 I am testifying on behalf of WEB Water and the South Dakota Association of Rural
10 Water Systems.

11 **How are you involved with the Dakota Access Pipeline (DAPL) project?**

12 I am the General Manager of WEB Water, a nonprofit rural water system affected by the
13 proposed Dakota Access Pipeline. I am one of seven rural water systems that will have
14 lines crossed by DAPL in the state of South Dakota. I am a member of the South Dakota
15 Association of Rural Water Systems.

16 **How many customers does WEB Water System serve?**

17 WEB Water serves clean drinking water to over 8,000 meters, 109 bulk accounts,
18 including 28 towns and communities in the region. WEB Water also serves water to 5
19 ethanol plants. With over 6,800 miles of water pipeline in the ground WEB Water is the
20 largest rural water system in the United States. It is important to WEB Water as well as

1 all of our customers that have worked so hard in making WEB Water the reality that it is
2 today, that we maintain the integrity of our rural water system for generations to come.

3 **Please state the purpose of your testimony in this proceeding:**

4 With 53 crossings with Dakota Access Pipeline, on behalf of WEB Water, I have been
5 negotiating in good faith to finalize a crossing agreement with Dakota Access Pipeline.
6 Most importantly, we are focusing on ensuring our drinking water supply in South
7 Dakota remains protected to the best of our abilities.

8 **Have you been working with Engineering Consultants to ensure that WEB Water's**
9 **waterlines re protected?**

10 Yes, we are working with DRG Engineering.

11 **What recommendations have been made to WEB Water to ensure the waterlines are**
12 **protected?**

13 Our engineers have recommended that we need a 100 feet buffer zone from where our
14 water lines are cased in fusible PVC. This recommendation comes from the angle of
15 which the DAPL will be crossing our waterlines. They are at a very steep angle at times
16 rather than being a perpendicular crossing. All waterlines are cased with fusible PVC,
17 including the 100 foot buffer zone. This comes from a white paper written by Dr. Delvin
18 DeBoer, formerly of SDSU (See Attachment A). This will ensure maximum safety of the
19 waterlines.

20 **Is there precedent in South Dakota that requires a 100 feet buffer zone?**

21 Yes, another pipeline project in South Dakota utilized a 100 feet buffer zone.

22 **Why is your testimony late-filed?**

23 We believed we had an agreement with DAPL. On July 6, 2015, we were first notified
24 that DAPL had changed their position on the 100 feet buffer zone recommended by our
25 Engineers.

26 **Would you be available to present testimony and respond to questions during the**
27 **formal hearing scheduled for September 29 through October 8, 2015?**

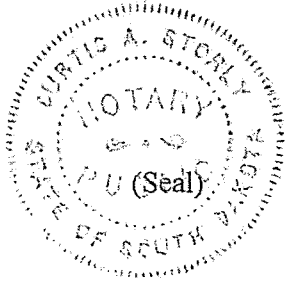
28 Yes.

29 **Does that conclude your testimony?**

30 Yes.

Steve Harper
Steve Harper

Subscribed and sworn to before me this 8th day of July, 2015.



Curtis A. Story
Notary Public, South Dakota
My commission expires: 06/29/2018